

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
BIG LOTS, <i>et al.</i> , ¹	Case No. 24-11967 (JKS)
Debtors.	(Jointly Administered)
	Related Docket Nos. 1962, 2012

**JOINDER AND RESERVATION OF RIGHTS OF VITELLI FOODS, LLC TO
SHANDONG TAIPENG INTELLIGENT HOUSEHOLD PRODUCTS CO. OBJECTION
TO MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) SETTING A BAR DATE
FOR FILING PROOFS OF CLAIMS FOR PRE-CLOSING ADMINISTRATIVE
EXPENSE CLAIMS AGAINST THE DEBTORS, (II) ESTABLISHING PRE-CLOSING
ADMINISTRATIVE EXPENSE CLAIMS PROCEDURES, AND (III) GRANTING
RELATED RELIEF, INCLUDING NOTICE AND FILING PROCEDURES**

Vitelli Foods, LLC (“Vitelli”), by and through its counsel, hereby files this Joinder and Reservation of Rights (the “Joinder”) to the *Shandong Taipeng Intelligent Household Products Co. Objection to Motion of Debtors for Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures and (III) Granting Related Relief, Including Notice and Filing Procedures* (the “Objection”) (D.I. 2012). In support of this Joinder, Vitelli respectfully states:

1. On September 9, 2024, the above-captioned debtors (the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

2. On February 18, 2025, Vitelli filed its *Motion of Vitelli Foods, LLC for Allowance and Payment of Administrative Claim under 11 U.S.C. §503(b)(1)(A)* (the “Admin. Claim”) (D.I. 2004).

3. On February 7, 2025, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures and (III) Granting Related Relief, Including Notice and Filing Procedures* (the “Motion”) (D.I. 1962) requesting the Court enter an order allowing the debtor to pay certain administrative claims and not others.

4. On February 19, 2025, Shandong Taipeng Intelligent Household Products Co. filed the Objection to the Motion (D.I. 2012).

5. Vitelli hereby joins in, supports, and incorporates herein by reference, the Response, and adopts the arguments in the Response as its own.

6. This Joinder is submitted without prejudice to, and with full reservation of, Vitelli’s rights, claims, defenses, and remedies, including the right to supplement the Joinder or modify, amend, or withdraw this Joinder, to seek discovery, to raise additional arguments and to introduce evidence at any hearing related to the Objection, and without in any way limiting any other rights of Vitelli to respond to the Objection, on any grounds, as may be appropriate.

WHEREFORE, Vitelli respectfully requests that the Court overrule the Motion.

Dated: February 20, 2025
Wilmington, Delaware

GELLERT SCALI BUSENKELL & BROWN LLC

/s/ Margaret F. England

Margaret F. England (DE 4248)

1201 N. Orange St., Ste. 300

Wilmington, DE 19801

Telephone: (302) 425-5806

Fax: (302) 425-5814

Email: mengland@gsbblaw.com

Counsel to Vitelli Foods, LLC